

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>QUILL INK BOOKS LIMITED,</b>	)	
	)	
<b>Plaintiff/Counterclaim Defendant,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 1:19-cv-476-LO-MSN</b>
	)	
<b>RACHELLE SOTO a/k/a ADDISON CAIN,</b>	)	
	)	
<b>Defendant/Counterclaim Plaintiff.</b>	)	

**PLAINTIFF’S MOTION FOR LEAVE  
TO FILE EXPERT DISCLOSURES OUT OF TIME**

Plaintiff Quill Ink Books Limited (“Quill” or “Plaintiff”), by counsel, and pursuant to the Federal Rules of Civil Procedure and the Rule 16(b) Scheduling Order (ECF No. 42), hereby moves this Court for leave to file its expert disclosures out of time. Plaintiff has filed a memorandum in support of the this motion under separate cover, and respectfully requests the Court enter the proposed order submitted herewith.

The parties have met and conferred, and Plaintiff requested Defendant’s consent to this motion, which has been denied. No oral argument on this motion is requested.

May 4, 2020

Respectfully submitted,

**QUILL INK BOOKS LIMITED**

By: /s/ John M. Bredehoft  
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*Counsel for Plaintiff  
Quill Ink Books Limited*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically provide notice to all counsel of record.

/s/ John M. Bredehoft  
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